

AGENT ADDRESS	AGENT DETAILS	FULL NAME	JOB TITLE	ORGANISATION	CUSTOMER ADDRESS	PHONE NUMBER	EMAIL ADDRESS	DUTY TO COOPERATE	LEGALLY COMPLIANT	SOUND	WHICH PART	WHICH PARAGRAPHS
16 Kimble Close, Knightcote, Southam, Warwickshire, CV47 2SJ	Mr Geoffrey Prince, Director, Geoffrey Prince Associates Ltd, gpkim16@aol.com, 07767 488724	Mr John Cawrey	Managing Director	Cawrey Limited	Cawrey Limited, Unit 7 - Pear Tree Business Park, Desford Lane, Ratby, LE6 0PG	01162390600	<a href="mailto:john.c@cawrey.co.uk">john.c@cawrey.co.uk</a>	No	No	No	Policy	

WHICH POLICY	WHICH POLICY MAP	WHICH DIAGRAM	WHICH TABLE	WHY PLAN NOT SOUND	MODIFICATIONS	HEARINGS	HEARING SESSIONS
These representations focus on Policies DS1 Development Strategy, DS2 Leicester and Leicestershire Unmet Needs, DS3 Housing Allocations, LUA1 Leicester Urban Area, and SC1 Service Centres.				The Local Plan as it stands is not legally compliant and fails to comply with the duty to cooperate as it has not yet taken into account any requirement to contribute towards meeting the unmet housing needs of Leicester City estimated at 17,454 dwellings.	<p>In order to make the Local Plan legally compliant and sound it will be necessary to allocate additional sites for residential development on the edge of Leicester and in Service Centres close to the edge of Leicester.</p> <p>Specifically we propose that Site Ref PSH2 Land at Gorse Hill, Anstey, which was assessed in the SHELAA Site Assessments 2020, be allocated for housing.</p> <p>This site is located on the edge of the Leicester Urban Area. The SHELAA describes the site as comprising scrubland/vacant land, and adds that the immediate surroundings are dominated by the A46 associated junction with the A5630 (Anstey Lane) and nearby residential properties and landscape areas. Its total site area is 4.58 ha; the net developable area is just under 3 ha and the site has a development capacity for around 90 dwellings (open market and affordable. The SHELAA 2020 site assessment concluded that the site is:</p> <ul style="list-style-type: none"><li>- A suitable location for development with no known irresolvable physical/environmental constraints preventing development and a suitable access can be achieved (this has been confirmed by the Highways Authority).</li><li>- Is available. It is owned by a developer with the intention to develop the site; and</li></ul> <p>- Is achievable, noting that there is considered to be a reasonable prospect that development will be delivered within the timeframe shown based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period.</p>	Yes	<p>Meeting the unmet housing needs of Leicester is a critical issue and needs to be effectively addressed to make the Local Plan legally compliant and sound.</p> <p>As such it will be necessary to identify additional sites to meet this need. It will be necessary to emonstrate that potential additioanl site allocations are in a suitable location, available and achievable.</p> <p>These matters can best be discussed through the hearing sessions chaired by an independent Inspector.</p>

# Charnwood Pre Submission Draft Local Plan 2021-2037

## Representations

These representations focus on Policies DS1 Development Strategy, DS2 Leicester and Leicestershire Unmet Needs, DS3 Housing Allocations, LUA1 Leicester Urban Area, and SC1 Service Centres. Specifically the purpose of these representations is to request that Charnwood Borough Council review their housing site allocations and consider including **Site Ref PSH2 Land at Gorse Hill, Anstey**, which was assessed in the SHELAA Site Assessments 2020.

This site is located on the edge of the Leicester Urban Area. The SHELAA describes the site as comprising scrubland/vacant land, and adds that the immediate surroundings are dominated by the A46 associated junction with the A5630 (Anstey Lane) and nearby residential properties and landscape areas. Its total site area is 4.58 ha; the net developable area is just under 3 ha and the site has a development capacity for around 90 dwellings (open market and affordable); an alternative scheme is also under consideration comprising 100% affordable rent units. The SHELAA 2020 site assessment concluded that the site is:

- A suitable location for development with no known irresolvable physical/environmental constraints preventing development and a suitable access can be achieved (this has been confirmed by the Highways Authority).
- Is available. It is owned by a developer with the intention to develop the site; and
- Is achievable, noting that there is considered to be a reasonable prospect that development will be delivered within the timeframe shown based on a judgement of the potential economic viability of the site and developer capacity to complete and let/sell the development over that period.

The SHELAA indicated a timescale for development of 6-10 years at a rate of development of 50 dwellings per annum. The developer, Cawrey Homes, is keen to bring this site forward for development as soon as possible subject to securing planning permission and considers that the timescale should be adjusted to 0-5 years.

Following a review of the Green Wedges the site has been removed from the Green Wedge on the policies map on the basis that it does not fulfil the functions of the green wedge; Instead it is shown as countryside.

As a potential development site the site compares favourably with other sites which have been proposed for allocation under Policy DS3: Housing Allocations when assessed against the sustainability framework. The analysis which assessed the site against other sites within the Anstey/Glenfield area showed that the site was of low-medium sensitivity having regard to the key environmental factors. It scored 2 greens (ie low sensitivity), 16 grey (low/medium sensitivity) and 3 orange (medium sensitivity). It did not score any medium-high or any high sensitivity ratings. However the two sites which have been proposed for allocation in this area both scored at least one medium high sensitivity rating. Moreover it is in a similar location to two nearby sites along Gynsill Lane which have planning permission and are under construction. The West of Gorse Hill site is significantly closer to Anstey village centre and local schools than the Gynsill Lane sites. Being on the edge of the Leicester Urban Area it is also close to services and facilities in the north-west quadrant of Leicester known as Beaumont Leys.

We are therefore somewhat surprised that this site has not been taken forward as a proposed housing allocation site in the Pre Submission Draft Local Plan (2021-2037) Policy DS3: Housing Allocations, either as an allocation site under Policy DS3, either as part of the Leicester Urban Area allocations or Service Centres (Anstey) allocations.

No longer having a function as part of the Green Wedge and surrounded by built development and major roads on the edge of Leicester, the allocation of this site is consistent with **Policy DS1: Development Strategy** which states that *'The overall spatial strategy for Charnwood between 2021 and 2037 is urban concentration and intensification with some limited dispersal to other areas of the Borough.'* At para 2.42 it adds: *'The focus of development at the edge of Leicester reflects our commitment to the economic and social focus of the city which is central to the success of the wider Housing and Economic Market Area of Leicester and Leicestershire. It is intended that development at the edge of the city reinforces our relationship with the city and the economic and social opportunities it presents.'*

The site satisfies many of the other criteria listed under this policy:

- The site is not in an environmentally sensitive area;
- It will contribute towards meeting Charnwood's housing needs (and also Leicester City's unmet housing needs – see comment on policy DS2 below);
- It will maintain the functions of Green Wedge land;
- It can deliver net gains in biodiversity – approximately 33% of the site will be undeveloped and include SUDS ponds);
- It will make efficient uses of underutilised land; and
- It accords with other policies of the Plan.

With regards to **Policy DS2: Leicester and Leicestershire's Unmet Needs** we note that the overall housing requirement for Charnwood as set out in Policy DS1 does not as yet make provision for contributing towards meeting Leicester City's unmet housing need. The policy states that the Council will publish a review of its Publication Draft Local Plan once agreement is reached by all partners on a Statement of Common Ground. We note that this requirement could be considerable.

In a Statement of Common Ground issued in March 2021, the extent of Leicester City's unmet housing need was set down. Between 2020 and 2036 this was calculated to be 7,742, but following a revision to the Government's new standard methodology in December 2020 which increased Leicester City's housing need by 35%, a further 9,712 homes were added to Leicester City's requirement. Thus the total unmet housing need for Leicester City now stands at 17,454.

It will be important that most of this unmet need is met on sites on land adjoining or close to the edge the built up area of Leicester in the adjoining Boroughs. The land at Gorsehill (ref PSH2) can make a useful contribution towards meeting this unmet housing requirement.

The allocation of this site also sits well with **Policy LUA1: Leicester Urban Area** which states:

'We will support Leicester Urban Area in its role as the central economic, social and cultural focus of the County. We will do this by supporting development that:

- delivers housing and employment allocations in accordance with Policy DS3 and DS4 or sustainable development that is in accordance with the pattern of development outlined in Policy DS1 and which supports our vision and objectives including making effective use of land;...'

The site at Gorse Hill is sustainable development which is in accordance with the pattern of development outlined in DS1. Further the development of this site will not impact on other aspects identified in Policy LUA1.

The allocation of this site also fits with **Policy SC1: Service Centres**. This states that the Borough Council will, support development that *'delivers allocations in accordance with Policy DS3 and DS4 or sustainable development that is in accordance with the pattern of development outlined in Policy DS1 and which supports our vision and objectives including making effective use of land'*. This wording is similar to Policy LUA1. At para 3.184 it recognises that *'Anstey, is located close to the boundary with the city of Leicester'*.

In conclusion, we consider that there is an overwhelming case for allocating site Ref PSH2 Land at Gorse Hill, Anstey for housing with a capacity of around 90 dwellings. This is a sustainable site in a sustainable location located on the edge of the Leicester Urban Area within Anstey, the closest Service Centre to the Leicester Urban Area. There are no physical/environmental constraints preventing its development and access can be achieved. Moreover its allocation is supported by Policies DS1 Development Strategy, LUA1: Leicester Urban Area and SC1: Service Centres. Further, in accordance with Policy DS2: Leicester and Leicestershire's Unmet Needs it will be necessary for the Council to identify further land for development on the edge of Leicester in an updated draft Local Plan when agreement has been reached in a Statement of Common Ground on the amount and distribution of Leicester City's unmet housing need. This site can make a useful contribution towards meeting this need. As noted in the SHELAA the site is suitable, available and achievable. The developer, a local house-builder, is keen to deliver this site as soon as planning permission can be obtained.

Until a Statement of Common Ground is reached amongst the HMA authorities regarding the amount and distribution of Leicester City's unmet housing needs, and the conclusions reflected in an amended Publication Draft Local Plan, then the Local Plan as it currently stands cannot be considered to be legally compliant, sound and compliant with the Duty to cooperate. However, it is recognised through Policy DS2 that the Council intends to address this key issue.

Prepared by

Geoffrey Prince Associates Ltd

For Cawrey Limited

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